

**NAVAL REACTORS DOE ORDER IMPLEMENTATION BULLETIN NUMBER
460.2A-98, REVISION 1**

Consistent with the NNPP overall concept of operations, the following provides specific implementation guidance for DOE Order 460.2A, DEPARTMENTAL MATERIALS TRANSPORTATION AND PACKAGING MANAGEMENT, and DOE Manual 460.2-1A, RADIOACTIVE MATERIAL TRANSPORTATION PRACTICES, for those activities under the Director's cognizance. The guidance takes precedence over DOE Order 460.2 series DEPARTMENTAL MATERIALS TRANSPORTATION AND PACKAGING MANAGEMENT, DOE Manual 460.2-1A, and guidance found in other related DOE documents.

In paragraph 3.a, DOE Manual 460.2-1A states that consistent with the responsibilities identified in Executive Order 12344, the Deputy Administrator, Naval Reactors, will determine the applicability of the Manual for activities and facilities under his control with the exceptions of transuranic waste shipments and national security shipments of spent nuclear fuel, both of which will be made in accordance with the Manual. DOE Manual 460.2-1A was written specifically for the purpose of promoting standard practices for shipment of radioactive materials across DOE organizations, including the Naval Nuclear Propulsion Program (NNPP). At the time of the Manual's development, the NNPP worked with DOE and its stakeholders to ensure that implementing the Manual for shipments containing nuclear spent fuel and transuranic waste would not significantly affect the NNPP's materials transportation and packaging program.

Furthermore, to maintain consistency of current policies concerning all other types of radioactive material shipments, the NNPP implements the practices of DOE Manual 460.2-1A subject to the following comments:

a. Paragraph 2.6.1 of the Manual discusses Transportation Plans prepared by Field Elements for non-classified spent nuclear fuel, high-level waste, and tritium-bearing reactor components. Naval Reactors Headquarters will determine which NNPP shipments require a Transportation Plan and the format of any such plan.

b. Paragraph 8.2.1 of the Manual discusses procedures for notifying State and Tribal officials about non-classified spent nuclear fuel and high-level waste shipments. Naval Reactors Headquarters will determine which NNPP shipments require State or Tribal notifications and the format of any such notifications.

c. Paragraph 10.2.1 of the Manual discusses the use of DOE's Transportation Tracking and Communications (TRANSCOM) system for non-classified spent nuclear fuel, high-level waste, and tritium bearing reactor components. Naval Reactors Headquarters will determine which NNPP shipments will use TRANSCOM.

In paragraph 3.c(1)(b), DOE Order 460.2A recognizes the responsibilities and authority of the Director, Naval Nuclear Propulsion Program and exempts the Program from the requirements of the Order.

Although DOE Order 460.2A is not applicable to the Naval Nuclear Propulsion Program (NNPP), it is Program practice to apply the provisions of DOE orders to the extent they are appropriate and consistent with Program practices. Accordingly, Program elements shall implement the requirements of DOE Order 460.2A, in accordance with the following comments:

a. Paragraph 4.d(1) of the Order discusses use of safe, dependable carriers for shipments of Highway Route Controlled Quantity, truckload radioactive material, and hazardous waste shipments. NNPP activities will ensure that safe, dependable highway carriers are used for all hazardous material and hazardous waste shipments. In making carrier fitness determinations, activities should refer to all available safety reviews of carriers, e.g. Federal Highway Administration safety fitness ratings; corporate ratings; and DOE, Transportation Management Program motor carrier evaluation profiles. Field Office approval is required for an activity to use a carrier for a hazardous material or hazardous waste shipment if no safety/fitness information is available on the carrier and the activity has no previous satisfactory experience with the carrier (in which case the NNPP activity should perform an evaluation of the carrier in accordance with standard DOE Motor Carrier Evaluation procedures).

b. Paragraph 4.d(2) of the Order discusses use of rates for common carriage. NNPP activities should select carriers that can provide the required level of service at the least cost to the Government. Valid corporate discount rates available to NNPP contractors, which can be verified by Field Elements, should be used by NNPP activities when these rates result in lower transportation charges than other discount rates, e.g. DOE discount rates.